

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

McCABE, WEISBERG & CONWAY, LLC
By: Lauren M. Moyer, Esq. (Atty.
I.D.#LMM2332)
216 Haddon Avenue, Suite 201
Westmont, NJ 08108
856-858-7080
Attorneys for Movant: Citizens Bank, N.A.

In Re:

Raquel Antoniello
Debtor

Case No.: 21-13155-KCF

Chapter: 7

Judge: Kathryn C. Ferguson

**CERTIFICATION REGARDING CALCULATION OF AMOUNTS DUE
(NOTE AND MORTGAGE DATED APRIL 3, 2018)**

Dimitris Poole of full age, employed as BANKRUPTCY SPECIALIST

by Citizens Bank, N.A., hereby certifies the following information:

Recorded on April 17, 2018, in Ocean County, in Book 17086, at Page 1139

Property Address: 15 Villanova Drive, Jackson, New Jersey 08527

Mortgage Holder: Citizens Bank, N.A.

I. PAYOFF STATEMENT

Unpaid Principal Balance	\$280,794.09
Accrued interest from 01/01/2020 to 05/07/2021	\$17,032.32
Late Charges	\$819.20
Recoverable Balance	\$260.00

Advances through 05/07/2021 for:

Escrow Advance	\$10,925.92
Pro Rata MIP/PMI	\$381.82
Other:	\$0.00
Sub-total of Advances	\$11,307.74
Less Escrow Monies	\$0.00
Net Advances	\$0.00

Interest on advances.....	\$0.00
Other Charges ()	\$0.00
Less unearned interest.....	\$0.00

TOTAL DUE AS OF 05/07/2021 \$310,213.35

Date of last payment: N/A

II. EQUITY ANALYSIS (When appropriate)

Estimated fair market value of real estate as of 04/19/2021 \$285,469.00*

Liens on real estate:

1. Real Estate Taxes as of __/__/____	\$0.00
2. First Mortgage as of 05/07/2021	\$310,213.35
3. Second Mortgage as of __/__/____	\$0.00
4. Other (_____)	\$0.00
TOTAL LIENS	\$310,213.35
APPARENT EQUITY AS OF 05/07/2021	\$0.00

*Source: Schedule D

I certify under penalty of perjury that the above is true.

Name: /s/Dimitris Poole

Date: 5/4/2021

State of Virginia

County of Henrico

21-200082

McCABE, WEISBERG & CONWAY, P.C.

By: Lauren M. Moyer, Esq., (Atty. I.D.# LMM2332)

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UNITED STATES BANKRUPTCY COURT

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IN RE:

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CERTIFICATION IN SUPPORT OF
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY

I, Dimitris Poole, do hereby certify:

1. I am a BANKRUPTCY SPECIALIST at Citizens Bank, N.A. and I have complete knowledge of the amount due on the within obligation and mortgage and I am authorized to make this certification.

2. The Debtor filed a Chapter 7 Petition on April 19, 2021.

3. Citizens Bank, N.A. is the holder of a mortgage on real property owned by Debtor and located at 15 Villanova Drive, Jackson, New Jersey 08527, recorded in the Office of the Clerk of Ocean County.

4. I have examined the payment records concerning the within referred to obligation and mortgage, and I find from said records that the amounts due on the mortgage are as set forth on the Certification Regarding Calculation of Amounts Due attached hereto.

5. The property has an estimated value of \$285,469.00, proving that there is a substantial lack of equity in the property. The source of this valuation is Schedule D.

6. The loan is currently due for the February 2020 payment; Debtor is 16 months delinquent with his/her mortgage payments.

7. Pursuant to the foregoing, Citizens Bank, N.A. contends that cause exists to grant relief from the Automatic Stay. Citizens Bank, N.A.'s interest in the subject realty is not adequately protected. There is little or no equity in the realty and the realty is not a necessary component to an effective reorganization.

8. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Name: /s/Dimitris Poole

Date: 5/4/2021

State of Virginia

County of Henrico